

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

M CORP DBA 11:59,	)	
	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	Case No. 1:24-cv-1823
	)	
INFINITIVE, INC., <i>et al.</i>	)	
	)	
<i>Defendants.</i>	)	
	)	

**INFINITIVE INC.'S MOTION TO COMPEL DISCLOSURE**

Pursuant to Rule 37(a)(3)(A), Defendant Infinitive, Inc. moves for an order compelling Plaintiff to fully comply with its disclosure requirements under Rule 26(a)(1) and for an award of its fees in bringing this Motion. Pursuant to Local Rule 37(E), Infinitive certifies it has spoken to Counsel for Plaintiff on multiple occasions and made numerous good-faith effort to resolve the subject matter of this Motion prior to its filing.

Dated: June 11, 2025

Respectfully submitted,

/s/ Micah E. Ticatch

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 11th day of June 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/ Micah E. Ticatch  
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